

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re: :  
THE FINANCIAL OVERSIGHT AND : PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO, : Title III  
as representative of : Case No. 17-BK-3283 (LTS)  
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)  
Debtors.<sup>1</sup> :  
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**INFORMATIVE MOTION OF OFFICIAL COMMITTEE  
REGARDING NOVEMBER 15-16, 2017, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding the Location and Procedures for Attendance, Participation and Observation of the November 15-16, 2017 Omnibus Hearing*, dated October 26, 2017 [Docket No. 1545] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins of Paul Hastings LLP will appear in person on behalf of the Committee at the November Omnibus Hearing (as defined in the Scheduling Order) in

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Courtroom 26B of the United States District Court for the Southern District of New York, and address, as necessary, the following matters:

- (a) *Motion of Official Committee of Unsecured Creditors for Order, Under Bankruptcy Rule 2004, Authorizing Discovery Program With Respect to Certain Causes of Puerto Rico Financial Crisis [Docket No. 706];*
- (b) *Motion of National Public Finance Guarantee Corporation for Entry of An Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery [Docket No. 1177];*
  - (i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1344];*
- (c) *Joint Motion by the Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp., Assured guaranty Municipal Corp., and the Mutual Fund Group for Order Authorizing Rule 2004 Examination [Docket No. 1178];*
  - (i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund*

*Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1344];*

- (d) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1283];*
  - (i) *Response of Official Committee of Unsecured Creditors to (I) Motion of National Public Finance Guarantee Corporation for Entry of Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery; (II) Joint Motion by Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp. Assured Guaranty Municipal Corp., and Mutual Fund Group for Order Authorizing Rule 2004 Examination; and (III) Ambac Assurance Corporations Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 [Docket No. 1344];*
- (e) *Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria [Docket No. 1514];*
  - (i) *Objection of Official Committee of Unsecured Creditors Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria [Docket No. 1602];*
- (f) Any objections or responses to any of the foregoing motion; and
- (g) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

2. The Committee anticipates that a total of three representatives (two attorneys and one financial advisor) will attend the November Omnibus Hearing at the United States District Court for the Southern District of New York.

3. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will attend, on behalf of the Committee, the November Omnibus Hearing at the United States District Court for the District of Puerto Rico.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: November 7, 2017

/s/ G. Alexander Bongartz

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- and -

/s/ Juan J. Casillas Ayala

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*Local Counsel to the Official Committee of Unsecured Creditors*